

UNITED STATES DISTRICT COURT
DISTRICT OF MAINE

Federal National Mortgage Association

Plaintiff

vs.

John J. Butler III and Sandra E. Butler

Defendants

CIVIL ACTION NO: 1:19-cv-00218-JAW

MOTION TO AMEND COMPLAINT

RE:

Wyman Road, Milbridge, ME 04658

Mortgage:
November 27, 2002
Book 2948, Page 210

NOW COMES the Plaintiff, Federal National Mortgage Association, by and through undersigned counsel, pursuant to Fed.R.Civ.P.15(a) and hereby moves to amend the Complaint of Foreclosure to reference “foreclosure and sale” throughout the entire document. As grounds therefore, Plaintiff states the following:

1. Plaintiff's Complaint was filed on May 14, 2019.
2. Proof of Service for both Defendants was completed by November 8, 2019.
3. On January 9, 2020, Plaintiff filed a Motion for Entry of Default Judgment as to Defendants. [ECF 18]
4. On April 13, 2020, this Court issued a Foreclosure Procedural Order authorizing Plaintiff to seek a Default Judgment on Documentary Evidence. [ECF 19]
5. On June 23, 2020, Plaintiff file a Motion to Continue the aforesaid Foreclosure Procedural Order, upon information and belief that the subject property was occupied. [ECF 20].
6. On July 3, 2020, this Court issued and Order on Plaintiff's Motion to Continue and Order to Show Cause. [ECF 21]
7. Pursuant to this Court's aforesaid Order, Plaintiff is hereby amending its Complaint to

reference “foreclosure and sale” throughout the entire document (See Exhibit A attached hereto).

8. Plaintiff has been unable to ascertain Defendants’ position to the bringing and granting of this motion.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court allow Plaintiff to amend the Complaint to reference “foreclosure and sale” throughout the entire document.

Dated: July 24, 2020

/s/ John A. Doonan, Esq.
John A. Doonan, Esq., Bar No. 3250
Reneau J. Longoria, Esq., Bar No. 5746
Attorneys for Plaintiff
Doonan, Graves & Longoria, LLC
100 Cummings Center, Suite 225D
Beverly, MA 01915
(978) 921-2670
JAD@dgndl.com
RJL@dgndl.com

CERTIFICATE OF SERVICE

I, John A. Doonan, Esq., hereby certify that on this 24th day of July, 2020 I served a copy of the above document by electronic notification using the CM/ECF system and/or First Class Mail to the following:

/s/ John A. Doonan, Esq.
John A. Doonan, Esq., Bar No. 3250
Reneau J. Longoria, Esq., Bar No. 5746
Attorneys for Plaintiff
Doonan, Graves & Longoria, LLC
100 Cummings Center, Suite 225D
Beverly, MA 01915
(978) 921-2670
JAD@dgndl.com
RJL@dgndl.com

SERVICE LIST

John J. Butler III
20739 2nd Street, Apt. B
Cottonwood, CA 96022

Sandra E. Butler
4780 Golden Sky Way, Unit 211
San Diego, CA 92154

Sandra E. Butler
10260 Camino Ruiz, Apt. 69
San Diego, CA 92126-3482

Sandra E. Butler
Wyman Road
Milbridge, ME 04658